

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

RALPH HAJ,) Case No.
)
 Plaintiff,)
)
v.)
)
DIVERSIFIED CONSULTANTS,)
INC.,)
)
 Defendant.)
)
-----)

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, defendant, Diversified Consultants, Inc. ("DCI"), through undersigned counsel, hereby removes this action from the Circuit Court of the State of Oregon, Washington County, Small Claims Department to the United States District Court for the District of Oregon.

Notice of Removal

1 In support of this Notice of Removal, DCI states as follows:
2
3

4 1. Plaintiff, Ralph Haj, originally commenced this action by filing a
5 complaint against DCI in the Circuit Court of the State or Oregon, Washington
6 County, Small Claims Department, where it is presently captioned as *Ralph Haj*
7 *v. Diversified Consultants, Inc.*, Case No.: 16SC13764. No further proceedings
8 before the state court have occurred. A true and correct copy of plaintiff's
9 Summons & Complaint is attached hereto as Exhibit A.
10

11 2. Upon information and belief, plaintiff's claims against DCI arise
12 under the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. § 1681, *et seq.* This
13 Court has jurisdiction over plaintiff's claim pursuant to 28 U.S.C. §§ 1331 and
14 1441 in that the claims are founded on a claim or right arising under the laws of
15 the United States.
16

17 3. DCI received plaintiff's summons and complaint on April 4, 2016.
18 This Notice of Removal is timely, having been filed within thirty (30) days of
19 the date on which DCI received plaintiff's complaint. *See* 28 U.S.C. § 1446.
20

21 4. Written notice of this Notice of Removal of this action is being
22 immediately provided to the Circuit Court of the State or Oregon, Washington
23 County, Small Claims Department. *See* Exhibit B.
24
25
26
27
28

Notice of Removal

5. Written notice of this Notice of Removal of this action is being caused to be served on the plaintiff.

WHEREFORE, defendant, Diversified Consultants, Inc., gives notice that this action is removed from the Circuit Court of the State or Oregon, Washington County, Small Claims Department, to the United States District Court for the District of Oregon.

Dated: April 18, 2016

Respectfully Submitted,

SESSIONS, FISHMAN, NATHAN & ISRAEL, L.L.P.

/s/Damian Richard
Damian P. Richard, Esq. (S)
1545 Hotel Circle South, Suite
San Diego, CA 92108
Tel: 619/758-1891
Fax: 619/296-2013
drichard@sessions.legal
*Attorney for Defendant,
Diversified Consultants, Inc.*

1
2 **CERTIFICATE OF SERVICE**
3

4
5 I hereby certify that on Monday, April 18, 2016, a copy of the foregoing was
6 served electronically upon the Clerk of the Court, and via Federal Express on
7 plaintiff at the below address:
8

9 Ralph Haj
10 7130 SW 163 RD, PL
11 Beaverton, OR 97007
12 Phone: (503) 642-7006
13 *Plaintiff, Pro Se*

14 */s/Damian Richard*
15 Damian P. Richard, Esq.
16 *Attorney for Defendant,*
17 *Diversified Consultants, Inc.*

21 Notice of Removal
22
23
24
25
26
27
28